

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of	)	
	)	
Revisions to Broadcast Auxiliary Service Rules in	)	ET Docket No. 01-75
Part 74 and Conforming Technical Rules for	)	
Broadcast Auxiliary Service, Cable Television	)	
Relay Service and Fixed Services in Parts 74, 78	)	
	)	
Telecommunications Industry Association, Petition	)	RM-9418
for Rule Making Regarding Digital Modulation for	)	
the Television Broadcast Auxiliary Service	)	
Broadcast Satellite-Service Use	)	
	)	
Alliance of Motion Picture and Television	)	RM-9856
Producers, Petition for Rule Making Regarding	)	
Low-Power Video Assist Devices in Portions of the	)	
UHF and VHF Television Bands	)	

**REPLY COMMENTS OF THE FIXED WIRELESS SECTION,  
WIRELESS COMMUNICATIONS DIVISION,  
TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

Pursuant to Section 1.415 of the Commission's Rules,<sup>1</sup> the Fixed Wireless Section (FWS) of the Wireless Communications Division of the Telecommunications Industry Association (TIA) hereby submits these reply comments in the above captioned proceeding. FWS responds principally to comments that are directed at issues raised in its original petition.<sup>2</sup>

**I. RESPONSE TO THE COMMENTS OF THE NATIONAL SPECTRUM  
MANAGERS ASSOCIATION**

In the interest of promoting the most efficient use of scarce spectrum resources, as well as consistency in the frequency coordination process, the FWS fully supports the comments of the

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<sup>1</sup> 47 C.F.R. § 1.415.

<sup>2</sup> See TIA Petition-RM-9418 filed March 5, 1998.

National Spectrum Managers Association (NSMA),<sup>3</sup> which are directed at paragraphs 36 through 38 of the NPRM.

## **II. RESPONSE TO THE COMMENTS OF COMSEARCH**

### **A. Digital Modulation in 944-952 MHz, 2, 7, and 13 GHz Bands**

In its comments, Comsearch raises some very important points in support of the Commission's proposed actions with respect to modifying Part 74 rules to permit digital modulation.<sup>4</sup> In addition, Comsearch proposes that the Commission should consider modification to the frequency plans to permit a range of narrower channels to be overlaid on the existing 25MHz channel plan, and also requests that the Commission consider capacity and loading standards similar to those in § 101.141 (a)(3).<sup>5</sup> All of these proposals would lead to greater efficiency and serve to relieve congestion in the BAS bands. The FWS fully supports Comsearch's comments on these matters.

### **B. Maximum Effective Isotropic Radiated Power (EIRP) for Short Paths**

In its comments on Section 2, paragraphs 13-17 of the NPRM, Comsearch supports the Commission's proposal to adopt the Section 101.141 formula for determining EIRP limits for short paths.<sup>6</sup> As it is consistent with the changes proposed in the TIA petition, the FWS also fully supports this proposal.

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<sup>3</sup> NSMA Comments filed June 25, 2001.

<sup>4</sup> Comsearch Comments filed June 25, 2001.

<sup>5</sup> *Id.* at page 2.

<sup>6</sup> *Id.* at page 2.

### **C. Transmitter Power**

The FWS agrees with Comsearch's comments in support of the Commission's proposal to specify maximum EIRP values for all aural and TV BAS frequency bands.<sup>7</sup>

### **D. Automatic Transmitter Power Control**

ATPC is commonly used in most modern microwave systems as a method of improving frequency coordination and encouraging improved efficiency. The FWS supports Comsearch's comments in support of the Commission's proposal to change part 74 rules to permit the use of APTC for BAS, and to follow the guidelines of TIA TSB-10-F.<sup>8</sup>

### **E. Interference to Geostationary Satellites**

The FWS agrees with Comsearch's support of the Commission's proposal to adopt part 101 rules, in parts 74 and 78, for consistency in the rules governing orbit avoidance.<sup>9</sup>

### **F. Frequency Coordination and Temporary Conditional Authority**

The FWS fully endorses Comsearch's comments in support of the commission's proposal to adopt the coordination procedures currently specified in part 101, for BAS services in part 74.<sup>10</sup> FWS also supports the practice of granting Temporary Conditional Authorizations in order to allow for the rapid deployment of systems.

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<sup>7</sup> *Id.* at page 3.

<sup>8</sup> *Id.* at page 4.

<sup>9</sup> *Id.* at page 4.

<sup>10</sup> *Id.* at page 5.

### **G. Frequency Tolerance**

Modern microwave equipment can meet frequency tolerance limits of 0.001% without difficulty. The FWS supports the Commission's proposal to adopt the minimum value of 0.001% as specified in part 101 of its Rules.

### **III. CONCLUSION**

TIA's Fixed Wireless Section long has had a substantial interest in the rule modifications being proposed in this proceeding. The FWS requests that the Commission take into consideration its views expressed above.

Respectfully submitted,

**Fixed Wireless Section,  
Wireless Communications Division,  
Telecommunications Industry Association**

/s/\_\_\_\_\_

Ronald D. Coles  
Chairman, Fixed Wireless Section

Bill Belt  
Director, Technical Regulatory Affairs  
Telecommunications Industry Association

1300 Pennsylvania Ave., NW  
Suite 350  
Washington, DC 20004  
(202) 383-1482

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